



322 Eighth Avenue
Suite 1704
New York, NY 10001 USA
+1.212.523.0686
www.seidenlawgroup.com

May 9, 2022

Honorable Shelley C. Chapman
U.S. Bankruptcy Judge
Southern District of New York
One Bowling Green, Courtroom 623
New York, NY 10004-1408

Re: *In re: MICHAEL DAVID GREENFIELD a.k.a. MICHAEL BEN-ARI* (Case No. 21-11411) (SCC)

Dear Judge Chapman,

I write on behalf of the Foreign Representative in the above-captioned matter to modify the relief sought in the Motion to Confirm the Foreign Representative's Authority to Repatriate Assets to Israel (Dkt. 21) (the "Motion").

In the Motion, the Foreign Representative sought to affirm his authority to realize, take control of, and repatriate to Israel: (1) all Non-Reserved Assets, identified and held in an escrow account controlled by Seiden Law Group LLP, counsel of record for the Foreign Representative, and all Non-Reserved and currently unidentified assets, which upon investigation, the Foreign Representative may locate and identify in the future; and (2) all Reserved Assets, identified and unidentified, conditional upon the agreement of the U.S. Department of Justice (the "DOJ"). Pursuant to a request by the DOJ, the Foreign Representative hereby without prejudice withdraws the relief requested in the Motion as to the identified and unidentified Reserved Assets. However, the Foreign Representative maintains his request for relief in the Motion affirming his authority to realize, take control of, and repatriate to Israel the Non-Reserved Assets.

The DOJ has no objection to the relief requested in the Motion with the modification described above. The Amended Proposed Order, attached herein as Exhibit A, reflects this modification.

Very truly yours,

/s/ Jake Nachmani
Jake Nachmani

CC: William I. Friedman
Trial Attorney, International Unit
Money Laundering & Asset Recovery Section
U.S. Department of Justice, Criminal Division

Robert W. Seiden, Esq.
Steve E. Seiden, Esq.
Michael Stolper, Esq.
Amiad Kushner, Esq.
Jake Nachmani, Esq.
Adam Rosen, Esq.
Richard Frankel, Esq.
Dov B. Gold, Esq.
Andrew Sklar, Esq.
Xintong Zhang, Esq.
Priya Lehal, Esq.
Kayla Conway, Investigator
Nat Francis, Snr. Investigator